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Attorneys for non-party Edward F. Arrigoni

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:

OTR MEDIA GROUP, INC.,

Debtor,

Chapter 11

Case No. 1-11-47385 (ESS)

OTR MEDIA GROUP, INC., 203 17TH REALTY LLC,
SAKELE BROTHERS, LLC *and* ONE MAIDEN LANE
REALTY, LLC, *all New York limited liability companies*,
848 FULTON REALTY CORP. *and* MING SHENG INC.,
New York corporations, GOTHAM BROAD, LLC, *a*
Delaware limited liability company, FOTINI
THEOHARIDU, *and* PHILLIPE JOCELINE, *natural*
persons,

Adv. Pro. No. 1-11-01448 (ESS)

Plaintiffs,

- vs. -

The CITY OF NEW YORK,

Defendant.

**DECLARATION OF EDWARD SAVIANO, ESQ. IN SUPPORT OF MOTION
FOR SANCTIONS AND TO RE-OPEN BY NON-PARTY EDWARD F. ARRIGONI**

EDWARD SAVIANO hereby declares pursuant to 28 U.S.C. §1746 and subject to the penalty of perjury, that the following statements are true and correct:

1. I am counsel for non-party Edward F. Arrigoni and I make this declaration in support of his motion for sanctions in the above-entitled adversary proceeding. I am fully familiar with the facts set forth herein.

2. My law firm, Saviano, P.C., has provided legal services to Mr. Arrigoni in this matter in connection with the subpoenas he received to give testimony. I am annexing hereto as Exh. A a copy of the billing records for this matter, consisting of time entries describing the services provided.

3. I have been practicing law for about 35 years. I graduated from Villanova Law School in 1979 and received a LLM from NYU Law School in 1980.

4. At present, Saviano, P.C. is a two-lawyer firm, consisting of myself and my associate, Elaine Yuen. Ms. Yuen graduated from Columbia Law School in 2010 and has been associated with Saviano, P.C. since 2012.

5. My hourly billing rate for this matter is \$420. My hourly billing rate is \$475 an hour, but for long term clients, such as Mr. Arrigoni, I charge my time at a reduced rate of \$420 an hour.

6. We charge Ms. Yuen's time at her standard billing rate, which in 2013 was \$150 an hour, and which is the rate Saviano P.C. charges for her time to all our clients on all matters on which she works. Effective, January 1, 2014, we increased Ms. Yuen's hourly rate to \$175 an hour and that is the rate that we now charge her time at for all clients on all matters.

7. I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
February 6, 2014

/s/Edward Saviano
Edward Saviano